

FFT Summary

NB Power Audit - June to October 2014

Entity	NBCRN	EUBVTN	Standard	Req	Compliance Issue	Risk Assessment	Mitigation Action
New Brunswick Power Corporation (NB Power)	NBCR001	2014002	EOP-005-2	R6	During a Compliance Audit conducted by NPCC from June 16, 2014 through October 29, 2014, it was discovered that NB Power, as a Transmission Operator (TOP), had a compliance issue related to EOP-005-2 R6. EOP-005-2 R6 requires TOPs to assess their system restoration plan at least once every five years using steady state and dynamic simulations to verify the restoration plan accomplishes its intended function. NB Power failed to assess its restoration plan with steady state and dynamic simulations within the five year time period, which was required to be completed by July 1, 2013. The duration of the compliance issue was from July 1, 2013 through April 27, 2014.	This issue posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system. No harm is known to have occurred. No changes were required to the existing restoration plans due either to the studies completed on April 28, 2014 by NB Power or the subsequent annual NPCC peer reviews of these studies on the Reliability Coordinator restoration plans. Stability simulations mandated by EOP-005-2 R6 of the current version of the standard, and performed as part of the April 28, 2014 study titled <i>Simulation of The NB System Operator "System Emergency Restoration Plan"</i>, validated that the strategies used in the existing restoration plan do not impair system stability.	To mitigate this compliance issue: 1) on April 28, 2014, NB Power issued a report entitled <i>Simulation of The NB System Operator "System Emergency Restoration Plan"</i>, complete with all required analysis. 2) to prevent reoccurrence of this compliance issue, as of March 3, 2014, NB power added a new position that reviews all newly approved standards and monitors the reporting timelines of all NERC Reliability Standards; and 3) as an additional measure to prevent reoccurrence of this compliance issue, as of December 5, 2014, NB Power has added to its Corporate Compliance Program a process for ensuring compliance readiness for all new, or revised, NERC Reliability

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					On April 28, 2014, NB Power corrected this compliance issue by completing all required steady state and dynamic simulations for its restoration plans and summarizing its findings in a report entitled <i>Simulation of The NB System Operator "System Emergency Restoration Plan"</i>. The cause of the compliance issue was a failure by NB Power to retain documentation of steady-state studies that were placed on a retired EMS system, and additionally, a failure to adequately prepare for the most recent revision of the standard, which explicitly requires dynamic studies to be carried out in addition to the traditional steady-state analysis mandated by previous version of the standard.		Standards.
New Brunswick Power Corporation (NB Power)	NBCR001	2014003	EOP-006-2	R3	During a Compliance Audit conducted by NPCC from June 16, 2014 through October 29, 2014, it was discovered that NB Power, as a Reliability Coordinator (RC), had a compliance issue related to EOP-006-2 R3.	This issue posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system. No harm is known to have occurred. Restoration drills were conducted on October 16	To mitigate this compliance issue: 1) as of February 25, 2014, NB Power corrected this compliance issue by completing an annual

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					EOP-006-2 R3 requires RCs to review their system restoration plans within 13 calendar months of the last review. NB Power failed to review its restoration plan within 13 calendar months of the last review. The last annual review of its restoration plans (current at the time of the Audit) was performed on February 25, 2014, fifteen (15) months after the previous review (dated November 1, 2012). The duration of the compliance issue was, therefore, from December 1, 2013 through February 24th, 2014. The cause of the compliance issue was a failure by NB Power to document revision history of restoration plan reviews in its own internal document titled <i>"Integrated System Emergency and Restoration Plan (ISERP)"</i>. This document summarizes all changes implemented in the NB Power restoration plans that result from their	and 30, 2013, as evidenced by Restoration Review sign-in sheets. These reviews did not produce any recommendation for substantive changes, but the results were not formally documented in NB Power's ISERP document within the 13 month timeline mandated by EOP-006-2 R3. NB Power's restoration plan underwent a second round of review by the NPCC Restoration Working Group (CO-11) in their August 13-14, 2014 meeting.	review of its system restoration plan; and 2) to prevent reoccurrence of this compliance issue, as of March 3, 2014, NB Power has added a new position tasked with ensuring that review deadlines for restoration plans are met, and that document revision history is updated accordingly.

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					periodic review, and represents formal evidence of compliance with the standard.		
New Brunswick Power Corporation (NB Power)	NBCR001	2014008	PRC-005-1b	R1	During a Compliance Audit conducted by NPCC from June 16, 2014 through October 29, 2014, it was discovered that NB Power, as a Transmission Owner (TO) had a compliance issue related to PRC-005-1b R1. PRC-005-1.1b R1 requires that TOs that own transmission protection systems have a maintenance and testing program for transmission protection system devices. NB Power relied on NPCC directory D3 (“<i>Maintenance Criteria for Bulk Power System Protection</i>”) and Cascade software for maintenance and testing but did not have its own system maintenance and testing program in place for its protection systems as required by the standard. NB Power's own Protection System and Maintenance Program has been in effect	This compliance issue posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system. No harm is known to have occurred. Although NB Power was not fully compliant with PRC-005-1.1b R1 because it lacked its own maintenance and testing program for transmission protection system devices it was using schedules and testing procedures contained in NPCC Directory #3.	To mitigate this compliance issue: 1) as of May 13, 2014, NB Power corrected this compliance issue by creating an internal document for its protection system maintenance and testing program. This document is titled “<i>NBP Protection System Maintenance and Testing Program</i>” Version 1; and 2) as of May 13, 2014 to prevent reoccurrence of this compliance issue, NB Power added the new NBP Maintenance and Testing Program to its approved documents and will continue updating the program as new versions of PRC-005 and other applicable standards become effective in New Brunswick.

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					since May 13, 2014. The duration of the issue was, therefore, from October 1, 2013 through May 12, 2014. The cause of the compliance issue was a failure by NB Power to recognize the fact that continuing to rely on NPCC Directory 3 was not sufficient to remain compliant with the standard, which requires a proprietary procedure for the testing and maintenance of its protection systems.		
New Brunswick Power Corporation (NBP)	NBCR001	2014009	PRC-017-0	R1	During a Compliance Audit conducted by NPCC from June 16, 2014 through October 29, 2014, it was discovered that NB Power, as a Transmission Owner (TO) had a compliance issue related to PRC-017-0 R1. PRC-017-0 R1 requires that TOs that own Special Protection Systems (SPS) have a maintenance and testing program for SPS devices.	This issue posed a minimal risk and did not pose a serious or substantial risk to the reliability of the bulk power system. No harm is known to have occurred. Although NB Power was not fully compliant with PRC-017-0 R1 because it lacked its own maintenance and testing program for SPS devices it was using schedules and testing procedures contained in NPCC Directory #3.	To mitigate this compliance issue: 1) as of May 13, 2014, NB Power corrected this compliance issue by creating an internal document for its protection system maintenance and testing program. This document is titled “<i>NBP Protection System Maintenance and Testing Program</i>” Version 1; and 2) to prevent reoccurrence of this compliance issue, NB Power added the new

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					NB Power relied on NPCC directory D3 (“<i>Maintenance Criteria for Bulk Power System Protection</i>”) and Cascade software for maintenance and testing but did not have its own system maintenance and testing program in place for its SPSs as required by the standard. NB Power's own Protection System and Maintenance Program, which includes SPS schemes, has been in effect since May 13, 2014. The duration of the compliance issue was, therefore, from October 1, 2013 through May 12, 2014. The cause of the compliance issue was a failure by NB Power to recognize that continuing to rely on NPCC Directory 3 was not sufficient to remain compliant with the standard, which requires a proprietary procedure for the testing and maintenance of its SPS schemes.		<i>NBP Maintenance and Testing Program</i> to its approved documents and will continue updating the program as new versions of PRC-005 and other applicable standards become effective in New Brunswick.

